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10	Oracle America, Inc. and Oracle International	
14	Corp.	
	corp.	
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	UNITED STATES I	DISTRICT COURT
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	DISTRICT O	OF NEVADA
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18	ORACLE USA, INC., a Colorado corporation;	Case No 2:10-cv-0106-LRH-PAL
	ORACLE AMERICA, INC., a Delaware	
19	corporation; and ORACLE INTERNATIONAL	
	CORPORATION, a California corporation,	PLAINTIFFS ORACLE USA, INC.,
20	D1 : .100	ORACLE AMERICA, INC., AND
	Plaintiffs,	ORACLE INTERNATIONAL
21	V.	CORPORATION'S MOTION TO
	DIMINI OTDEET INC. N. 1	SEAL EXHIBITS A-B, D-K, R-S, and
22	RIMINI STREET, INC., a Nevada corporation;	U-V TO THE DECLARATION OF
	SETH RAVIN, an individual,	GEOFFREY M. HOWARD IN
23	D.C. 1.	SUPPORT OF THE PARTIES' JOINT
	Defendants.	CASE MANAGEMENT
24		CONFERENCE STATEMENT
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1	PLAINTIFFS' MOTION TO SEAL		
2	Pursuant to the Stipulated Protective Order governing confidentiality of documents		
3	entered by the Court on May 21, 2010, Dkt. 55 ("Protective Order"), and Rules 5.2 and 26(c) of		
4	the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc. and		
5	Oracle International Corporation (together "Oracle" or "Plaintiffs") respectfully request that the		
6	Court order the Clerk of the Court to file under seal Exhibits A-B, D-K, R-S, and U-V to the		
7	Declaration of Geoffrey M. Howard in Support of the Parties' Joint Case Management		
8	Conference Statement ("Exhibits A-B, D-K, R-S, and U-V"). Exhibits A-B, D-K, R-S, and U-V		
9	were individually lodged under seal with the Court on November 4, 2011. See Dkt. 170-183.		
10	Sealing Exhibits A-B, D-K, R-S, and U-V is requested because the documents contain		
11	information that Defendant Rimini Street ("Rimini") has designated as "Confidential		
12	Information" and as "Highly Confidential Information – Attorneys' Eyes Only" under the terms		
13	of the Protective Order. The Protective Order provides that: "Counsel for any Designating Party		
14	may designate any Discovery Material as 'Confidential Information' or 'Highly Confidential		
15	Information – Attorneys' Eyes Only' under the terms of this Protective Order only if such		
16	counsel in good faith believes that such Discovery Material contains such information and		
17	is subject to protection under Federal Rule of Civil Procedure 26(c). The designation by any		
18	Designating Party of any Discovery Material as 'Confidential Information' or 'Highly		
19	Confidential Information -Attorneys' Eyes Only' shall constitute a representation that an		
20	attorney for the Designating Party reasonably believes there is a valid basis for such		
21	designation." Protective Order ¶ 2 (emphasis supplied).		
22	Thus, in identifying Exhibits A-B, D-K, R-S, and U-V as containing Confidential and		
23	Highly Confidential material, Rimini, as the designating party, contends that that good cause		
24	exists for sealing Exhibits A-B, D-K, R-S, and U-V.		
25	Oracle has submitted all other exhibits to the Declaration of Geoffrey M. Howard in		
26	Support of the Parties' Joint Case Management Conference Statement filed November 4, 2011,		
27	for filing in the Court's public files, which would allow public access to the filings except for the		
28	documents Rimini has designated as Confidential and Highly Confidential. Accordingly, the		

1	request to seal is narrowly tailored.		
2	For the foregoing reasons, Oracle respectfully requests that the Court find that good cause		
3	exists to file under seal Exhibits A-B, D-K, R-S, and U-V.		
4			
5	DATED: November 4, 2011	BINGHAM McCUTCHEN LLP	
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7		Dry /a/Cooffney M. Hoyyand	
8		By: /s/ Geoffrey M. Howard Geoffrey M. Howard	
9		Attorneys for Plaintiffs Oracle USA, Inc., Oracle America, Inc.,	
10		and Oracle International Corp.	
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15	UNITED STATES D	DISTRICT COURT
16		
17	DISTRICT O	FNEVADA
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18	ORACLE USA, INC., a Colorado corporation;	Case No 2:10-cv-0106-LRH-PAL
19	ORACLE AMERICA, INC., a Delaware corporation; and ORACLE INTERNATIONAL	
19	CORPORATION, a California corporation,	[PROPOSED] ORDER GRANTING
20	Plaintiffs,	PLAINTIFFS ORACLE USA, INC., ORACLE AMERICA, INC., AND
21	V.	ORACLE INTERNATIONAL
21		CORPORATION'S MOTION TO
22	RIMINI STREET, INC., a Nevada corporation; SETH RAVIN, an individual,	SEAL EXHIBITS A-B, D-K, R-S, AND U-V TO THE DECLARATION OF
23		GEOFFREY M. HOWARD IN
	Defendants.	SUPPORT OF THE PARTIES' JOINT
24		CASE MANAGEMENT CONFERENCE STATEMENT
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1	[PROPOSED] ORDER		
2	Pending before this Court is Plaintiffs Oracle USA, Inc., Oracle America, Inc. and Oracle		
3	International Corporation (together "Oracle" or "Plaintiffs") Motion to Seal Exhibits to the		
4	Declaration of Geoffrey M. Howard in Support of Joint Case Management Statement [Docket		
5	#169]. Federal Rule of Civil Procedure 26(c) provides broad discretion for a trial court to permit		
6	sealing of court documents for, inter alia, the protection of "a trade secret or other confidential		
7	research, development, or commercial information." Fed. R. Civ. P. 26(c). Having considered		
8	Plaintiffs' Motion to Seal, compelling reasons having been shown and good cause existing:		
9	IT IS HEREBY ORDERED THAT: Plaintiffs' Motion to Seal is GRANTED.		
10	The Clerk of the Court shall file under seal Exhibits A-B, D-K, R-S, and U-V to the Declaration		
11	of Geoffrey M. Howard in Support of Joint Case Management Statement.		
12	IT IS SO ORDERED.		
13	DATED:" November 7, 2011		
14 15 16 17 18 19 20 21 22 23 24	By: Hon. Peggy A. Leen United States Magistrate Judge		
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